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IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

AMERICAN NATIONAL PROPERTY)
AND CASUALTY COMPANY)
Plaintiff,	<i>)</i>)
) Case No.: 3:08-CV-00604
v.)
) Judge Aleta A. Trauger
CAMPBELL INSURANCE, INC.,) Magistrate Judge John S. Bryant
TOMMY L. CAMPBELL, and)
MARSHA COLLEEN CAMPBELL,) JURY DEMAND
and A 2 Z INSURANCE, INC.)
LIBERTY MUTUAL INS. CO., and)
MONTGOMERY MUTUAL INS.CO.)
)
Defendants.)

MOTION FOR PERMISSION TO FILE REPLY TO PLAINTIFF'S RESPONSE TO MOTION TO COMPEL DISCOVERY

Come the Defendants, Campbell Insurance, Inc., Tommy L. Campbell, Marsha Colleen Campbell and A 2 Z Insurance, Inc., and, pursuant to L.R. 7.01(b), move the Court for permission to file a reply to Plaintiff's response filed April 30, 2010 [241] to these Defendants' Motion to Compel Discovery. In support thereof, these Defendants would respectfully show the Court the Plaintiff's response contains factual inaccuracies and misstatements which may mislead the Court in deciding the Motion to Compel Discovery.

Plaintiff, in the response [241] makes the following statements beginning on page 3 and continuing on to page 4 of the response:

In a nutshell, the Campbell Defendants had a contractual obligation to maintain the secrecy of and return certain plainly specified types of confidential business information, but failed to do so.

Both Tommy and Colleen Campbell signed the Agent Agreement, agreeing that the above-listed types of information were "trade secrets